

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

IN RE:	)	CHAPTER 13
	)	
SANDRA VENTRONE	)	CASE NO. 15-52886
	)	
Debtor	)	JUDGE ALAN M. KOSCHIK
	)	
	)	<b><u>MOTION TO DEEM MORTGAGE</u></b>
	)	<b><u>CURRENT</u></b>

Now comes the Debtor, Sandra Ventrone, by and through the undersigned counsel, and moves the Court for an order deeming Debtor's mortgage with Seterus current. A dispute has arisen between Debtor and Seterus concerning the status of Debtor's mortgage. Debtor says she is current and has never missed a payment on her mortgage.

WHEREFORE, Debtor prays the Court issue an order deeming the subject mortgage current and that the subject case be kept open until resolution of this motion.

Respectfully submitted by,

/s/ Robert W. Heydorn  
Robert W. Heydorn, Attorney for Debtor  
Ohio Reg. No. 0000898  
Hoover, Heydorn & Herrnstein Co., LPA  
111 Stow Avenue, Suite 100  
Cuyahoga Falls, OH 44221  
Phone: 330-929-2676  
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**NOTICE**

**Pursuant to LBR9013-3 Notice is hereby given that any response or objection must be filed within TWENTY-ONE (21) days, or such other time as specified by**

applicable Federal Rule of Bankruptcy Procedure or statute or as the Court may order, from the date of service set forth on the certificate of service, if relief sought is opposed, and that the Court is authorized to grant the relief requested without further notice unless a timely objection is filed.

**NOTICE OF DEBTOR'S MOTION DEEMING MORTGAGE CURRENT**

Debtor has filed papers with the Court as stated above.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you wish to object to the Court sustaining Debtors' objection without holding a hearing, or if you want the Court to consider your views on the objection, then on or before **September 30, 2018** you, or your attorney, must:

- ❖ File, with the Court, a written request for a hearing, and a written response setting forth the specific grounds explaining your position at:

Clerk, U.S. Bankruptcy Court  
Northern District of Ohio  
2 South Main Street  
Akron, OH 44308

If you mail your Objection to the court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

- ❖ Mail a copy to:

Robert W. Heydorn, Esq.  
111 Stow Avenue, Suite 100  
Cuyahoga Falls, OH 44221

Keith L. Rucinski, Trustee  
One Cascade Plaza, Suite 2020  
Akron, OH 44308

If you, or your attorney, do not take these steps, the Court may decide that you do not oppose the Debtor's motion and may enter an order granting that motion.

Date: September 8, 2018

Signature: /s/ Robert W. Heydorn  
Robert W. Heydorn, Attorney for Debtor

**CERTIFICATE OF SERVICE**

**I certify that on September 8, 2018, a true and correct copy of the foregoing Motion was served:**

**Via the Court's Electronic Case Filing System to these entities and individuals who are listed on the Court's Electronic Mail Notice List:**

Keith L. Rucinski, Chapter 13 Trustee at [krucinski@ecf.epiqsystems.com](mailto:krucinski@ecf.epiqsystems.com),  
[efilings@ch13akron.com](mailto:efilings@ch13akron.com)

Office of the U.S. Trustee at [registered\\_address@usdoj.gov](mailto:registered_address@usdoj.gov)

**And by regular US mail, postage prepaid, on:**

Sandra Ventrone  
319 Ellen Avenue  
Akron, OH 44305

Seterus  
PO Box 1077  
Hartford, CT 06143-1077

Federal National Mortgage Association  
c/o Edward Bailey, Attorney for Creditor  
30455 Solon Road  
Solon, OH 44139

/s/ Robert W. Heydorn  
Robert W. Heydorn, Attorney for Debtor  
Ohio Reg. No. 0000898  
Hoover, Heydorn & Herrnstein Co., LPA  
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